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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268~0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO RESPOND TO OCA/USPS-T5-5 (August 2, 1996)

On July 19, 1996, OCA directed interrogatories OCA/USPS-T5-5 through 12 to witness Patelunas. Witness Patelunas's responses to T5-10 through 12 are being filed today. Interrogatories T5-5 through 9 were redirected to the Postal Service. The Postal Service's responses to T5-6 through 9 also are being filed today.

Thus, only interrogatory T5–5 of this set remains outstanding. This interrogatory basically requests explanations for increases in sampling error for various categories of letter-shaped mail volume proportions from the City Carrier Cost System. The Postal Service requests an extension of time until Monday, August 12, 1996 to respond to this interrogatory. This extension is requested as additional investigation is needed in order to respond. Also, those persons involved in the effort to investigate and respond to the interrogatory have prior commitments in the coming week which will interfere with their ability to devote time to responding. If the Postal Service is able to file a response sooner than Monday, August 12, 1996, it will do so. Counsel for the Postal Service today attempted to reach counsel for the OCA to discuss the request for extension, but was not able to make contact prior to preparing this motion for filing.



Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990; Fax –5402 August 2, 1996